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son, 182 S. W. 897 (Ark.); *Rie v. Rie*, 34 Ark. 37; *Hayes v. Hayes*, 144 Cal. 625, 78 Pac. 19. But if the confession is made in open court the danger of collusion is lessened. So some courts have held that the petitioner's testimony is then sufficient corroboration. *Smith v. Smith*, 119 Cal. 183, 48 Pac. 730; *Hague v. Hague*, 95 Atl. 192 (N. J.).

FEDERAL COURTS — JURISDICTION BASED ON DIVERSITY OF CITIZENSHIP — INTERPLEADING A CLAIMANT WHO IS A CITIZEN OF THE SAME STATE AS THE PLAINTIFF. — The plaintiff bank, a New York corporation, was sued for a deposit, in a federal court, by a New Jersey corporation. The plaintiff, thereupon, brought a bill in the nature of an interpleader in the same court, praying that two citizens of New York and a New York corporation, claimants for the same fund, interplead in the suit. The original claimant contended that the bill, if allowed, would deprive the court of its jurisdiction, which was based on diversity of citizenship. *Held*, that the bill be granted. *Sherman Nat. Bank v. Shubert Theatrical Co.*, 56 N. Y. L. J. 1087 (Dist. Ct., S. D., N. Y.).

Diversity of citizenship, sufficient to create federal jurisdiction, is only achieved when all parties plaintiff are citizens of different states from all parties defendant. *Strawbridge v. Curtiss*, 3 Cranch (U. S.) 267. Yet actions may be "controversies between citizens of different states," even though parties not from different states are, at various times, involved in the determination of the suit. Thus, a bill to set aside a fraudulent conveyance which would, if unhampered, defeat an original decree over which the federal court had jurisdiction has been sustained without regard to the citizenship of the parties. *Hobbs Mfg. Co. v. Gooding*, 164 Fed. 91. See 22 HARV. L. REV. 304. So any proceeding which may be truly considered ancillary to an original proceeding, in which the court has jurisdiction, has been held maintainable without reference to citizenship. *Root v. Woolworth*, 150 U. S. 401. See *New Orleans v. Fisher*, 180 U. S. 185, 196. It is true that from the point of view of the old chancery courts, any bill to enjoin a suit at law was an original bill. The federal courts, however, regard such as merely supplementary to the original suit. *Freeman v. Howe*, 24 How. (U. S.) 450, 460; *Minnesota Co. v. St. Paul Co.*, 2 Wall. (U. S.) 609, 633. But an interpleader involves not alone an injunction — it involves the determination of the true owner of the claim. Can it be said that the determination of whether two strangers to the original suit are the owners of the claim, even though it involves the determination of whether the original claimant is the owner or not, is truly ancillary to the original proceeding? An early case has so held without discussion. *Stone v. Bishop*, 4 Cliff. (U. S.) 593. While the result may be desirable, the logic is not conclusive.

INJUNCTIONS — ACTS RESTRAINED — PUBLICATION OF PHOTOGRAPH WHEN EXCLUSIVE PHOTOGRAPHIC PRIVILEGES HAVE BEEN GRANTED TO ANOTHER. — The promoters of a dog show purported to assign the sole photographic rights in connection with the show to the plaintiffs. The defendants who had knowledge of the concession took photographs of the show and published them in their magazine. The plaintiffs seek an injunction restraining the further publication of the photographs. *Held*, that the injunction do not issue. *Sports & General Press Agency v. "Our Dogs" Publishing Co.*, [1916] 2 K. B. 880.

It is generally recognized that the literary or artistic producer has a property right in his creations. After publication such right may be protected only by copyright. *Pierce-Bushnell Co. v. Werckmeister*, 72 Fed. 54. But before publication, the common law will recognize and protect original literary and artistic property. So the right of a professor to restrain the publication of lectures orally delivered in his classroom, has been established. *Caird v. Sime*, L. R. 12 A. C. 326. An author has a similar property in his composition. *Millar v. Taylor*, 4 Burr. 2303, 2315; *Palmer v. De Witt*, 47 N. Y. 532; *Macklin v.*